# IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:	) Chapter 11
W. R. GRACE & CO., et al.,	) Case No. 01-01139 (JKF)
Debtors.	) (Jointly Administered)
	) Re: Docket No. 13406

## DEBTORS' DESIGNATION OF EXPERT WITNESSES AND EXPERT REPORTS RELATING TO THE LACK OF HAZARD ISSUES

In accordance with this Court's October 13, 2006 Amended Order Setting Various Deadlines Regarding Objections to Asbestos Property Damage Claims ("PD Claims"), Docket No. 13406, the Debtors hereby designate expert witnesses and provide expert reports and/or adopt previously disclosed expert witness reports as follows:

### **Expert Witnesses and Reports**

- 1. Richard J. Lee, Ph.D.
  - January 15, 2007 Expert Report of Richard J. Lee, Ph.D. For Asbestos Property Damage Claims Lack of Hazard Proceeding, filed contemporaneously herewith.
- 2. Morton Corn, Ph.D., CSP
  - October 14, 2005 Expert Report on Limitations of Dust Sampling Methodology, Docket No. 9663
  - January 15, 2007 Expert Report, A Brief History of U.S. Concern For The Asbestos Inhalation Risk To Occupants and Maintenance Workers In Buildings With Asbestos-Containing Materials (ACM), filed contemporaneously herewith.
- 3. William G. Hughson, M.D., D. Phil.
  - January 12, 2007 Expert Witness Disclosure of William G. Hughson, M.D.,
    D. Phil, filed contemporaneously herewith.

#### 4. Lewis N. Klar, Q.C.

 January 11, 2007 Expert Report on Canadian Product Liability Law and Its Application to Asbestos in Buildings Claims, filed contemporaneously herewith.

## 5. Charles L. Blake, CIH

• January 16, 2007 Expert Report, Assessment of Libby PD Claims for Evidence of Hazard, filed contemporaneously herewith.

# 6. Gordon W. Spratt, M. Eng., P. Eng.

 January 15, 2007 Expert Report on The Use of Asbestos-Containing Surfacing Materials, Including W.R. Grace Products, in Canada from 1960 to 1975, filed contemporaneously herewith.

## 7. Roger G. Morse, AIA

• October 17, 2005 Report of Roger G. Morse, AIA on ASTM Microvacuuming Dust Sampling Methods, Docket No. 9664.

#### 8. Elizabeth Anderson, Ph.D., A.T.S. Fellow

Report to be provided.

Debtors continue to analyze the PD Claims that have been submitted in these Chapter 11 cases and reserve the right to supplement or amend the reports of its experts as new or additional information may become available, or as may be permitted by the applicable rules of procedure or the Court.

Dated: January 16, 2007

#### KIRKLAND & ELLIS LLP

David M. Bernick, P.C. Janet S. Baer Lisa G. Esayian 200 East Randolph Drive Chicago, IL 60601 (312) 861-2000

and

PACHULSKI STANG ZIEHL YOUNG JONES & WEINTRAUB, LLP

Laura Davis Jones (Bar No. 2436) Lames E. O'Neill (Bar No. 4042) 919 North Market Street, 17<sup>th</sup> Floor P. O. Box 8705

Wilmington, DE 19899-8705 (302) 652-4100

Co-Counsel for the Debtors and Debtors in Possession